



GHG Surface Emissions Assessment

Environmental Management Program

Background / Purpose: California Air Resources Board is proposing new legislation regarding Methane emissions from Municipal Solid Waste Landfills. In particular, landfill Methane detection surface emission limits being lowered to 200 ppm. The proposed regulation will include new Instantaneous and Integrated Landfill Methane Surface Monitoring Requirements and record keeping and reporting requirements. The purpose of this EMP is to be ready for the regulations by determining the necessary resources and methods required to meet the new surface emissions standard.

Objective: Be prepared to implement enhanced surface emissions program to meet new methane standards upon regulatory enactment.

Related Significant Aspects: Landfill site inspections, fugitive methane gas emissions, improper gas collection system operation,

Target: Meet proposed landfill surface emissions standards of 500 ppm methane maximum detection limit instantaneous and 25 ppm integrated.

Target Completion Date(s): December 2009

Action Plan: Follow proposed California Air Resources Board rulemaking "Methane Emissions from Municipal Solid Waste Landfills" particularly the "Landfill Methane Surface Emission Limit" which includes "Instantaneous and Integrated Landfill Methane Surface Monitoring Requirements" and "Record Keeping and Reporting Requirements." Identify necessary resources and methods to meet 200 ppm surface emissions standard including monitoring and record keeping at Miramar landfill.

Responsible Person(s): Ray Purtee, Michael Thompson

Resources Required: TBD based on proposed regulatory requirements

Environmental Performance Indicator(s): Surface emissions survey data – number of 200 ppm or greater methane hits detected at sample points

Comments (including other expected benefits or cost savings): Per the State rulemaking logic-reducing the surface emissions standard to 200ppm reduces GHG emissions.

Baseline Data: Surface emissions at 500ppm or greater methane history data for the Miramar landfill

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Approved by: Steven F. Fontana, Deputy Environmental Services Director

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EMP Schedule					
Step	Action Items	Responsibilities	Role	Schedule	Resources Required
1	Follow State rulemaking -participate in workshops -monitor industry response	Purtee	Lead	11/08 5/09 6/09 (final rule)	
2	Identify necessary resources -review historical monitoring data -perform tests of standard at sites -estimate labor hours, equipment needs -contract versus in-house -estimate CIP needs	Purtee Thompson	Lead	3/10	Budget request PE/NPE
3	Obtain necessary resources -submit personnel request -submit lease/purchase request -submit contractual service request	Purtee Thompson	Lead	6/10	City Personnel Dept City Purchasing Dept
4	Implement Compliance Program	Purtee Thompson	Lead	12/09 1/1/11 (rule effective date)	

Comments (report performance/milestones):

Not much has changed since the last update:

Rule is still in draft stage and the latest draft issued in March contains changes that we hoped would appear.

The current draft rule allows 500 ppm emissions as the compliance standard and only recording 200ppm levels found. There is a 25ppm integrated (averaged) emissions standard which shouldn't be hard to meet, but there's plenty of work in documenting it (25 ft switchbacks, etc.)

Other new language in the rule exempts older sites before 1977 so now only Chollas and North & West Miramar will have to comply, and possibly South Miramar because of NSPS standard.

So some of the benefits of these changes include: eliminates a significant financial impact to us- cost to install a gas collection system \$2M at Mission Bay, and, reduces the projected staffing and contractual services

needed. But recent estimates of these services from SCS show that there's still a great deal of field work and record keeping involved in the new monitoring.

This tentative rule effective date 12/09 is from IWMB staff but seems improbable. Implementing the rule through local air districts will require local public hearings, workshops, etc which could mean two years to implement. We have decided that our operational budget for FY11 will reflect rule needs.